IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CABLE NEWS NETWORK, INC., MS NOW CABLE, LLC, POLITICO LLC, ET AL., *Plaintiffs,* *v.* DONALD J. TRUMP, ET AL., *Defendants.*	Case No. 1:26-cv-03287-TJK

BRIEF OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE, NATIONAL ASSOCIATION OF BLACK JOURNALISTS, NATIONAL NEWSPAPER PUBLISHERS ASSOCIATION, AND APRIL D. RYAN AS *AMICUS CURIAE* IN SUPPORT OF PLAINTIFFS

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TABLE OF CONTENTS

STATEMENTS OF INTEREST ..... ***ERROR! BOOKMARK NOT DEFINED.***

SUMMARY OF ARGUMENT *3*

I. **THE BAN RUNS AFOUL OF THE FIRST AMENDMENT RIGHT TO RECEIVE INFORMATION AND HAS A STARK IMPACT ON BLACK VIEWERS OF NETWORK BROADCAST JOURNALISM.** **4**

A. While Not Exclusive, CNN, MS NOW, and Politico are Among News Media Outlets that Many Black Americans Trust. *6*

B. This Administration's Pattern of Imposing Media Bans Not Only Affects the Communities that these Reporters Reach but Impairs the Ability of Targeted Reporters to do Their Jobs Effectively. *9*

C. Technology has Fundamentally Changed the Way Americans Consume News Media. *13*

CONCLUSION *15*

CERTIFICATE OF COMPLIANCE *17*

CERTIFICATE OF SERVICE *18*

TABLE OF AUTHORITIES

CASES

Bd. of Educ., Island Trees Union Free Sch. Dist. No. 26 v. Pico, 457 U.S. 853 (1982) 5

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Martin v. City of Struthers, 319 U.S. 141 (1943) 4, 5

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YOUGOV SURVEY: TRUST IN MEDIA, YOUGOV, 21, https://ygo-assets-websites-editorial-emea.yougov.net/documents/Trust_in_Media_poll_results_TewWyVH.pdf 7

REGULATIONS

Exec. Order No. 14, 253, 90 Fed. Reg. 14563 (Apr. 3, 2025) 8

INTERESTS OF AMICI CURIAE

Amicus curiae **The National Association for the Advancement of Colored People ("NAACP")**, founded in 1909, is the nation's first and foremost civil rights organization. The NAACP was established to ensure the political, educational, social, and economic equality of rights of all people. The Association endeavors to achieve equity, political rights, and social inclusion by advancing policies and practices that expand human and civil rights, eliminate racial discrimination, and accelerate the well-being, education, and economic security of Black people and all persons of color. Included in its membership are Black non-citizens and other non-citizens of color. The Association's interest in protecting the free press and the right to receive information—rights secured under the First Amendment—is best demonstrated in its production of The Crisis, which since 1910 has been a valued and reliable source of news media and information for its members, and the public, alike. The Association's past litigation of First Amendment cases where the U.S. Supreme Court formally recognized the freedom of association as a distinct constitutional right like *NAACP v. Alabama* (1958) and *NAACP v. Button* (1963) is a clear beacon of the NAACP's vested interest in protecting the First Amendment freedoms broadly.

Amicus curiae The **National Association of Black Journalists ("NABJ")** is the nation's largest non-profit trade association that serves and advocates for over 4,300 Black journalists and media professionals worldwide. Founded in 1975, NABJ was created to provide quality programs, services, and advocacy for Black journalists worldwide. As the premier trade association for Black media personnel, the NABJ is uniquely positioned to speak to the broad reach of the First Amendment, the importance of having full and unbiased access to the White House, and the hostilities that Black journalists have faced when reporting the news to its audience.

Amicus Curiae The **National Newspaper Publishers Association ("NNPA")** founded in 1947, is a trade association of more than 200 Black-owned community newspapers from around the United States. NNPA delivers news, information, and commentary to over 22 million people weekly. Led by its President and CEO, Dr. Benjamin F. Chavis, Jr., Americans from all backgrounds seek news from the Black perspective from the NNPA member newspapers around the country. NNPA has emerged as the voice of the Black Press and is uniquely positioned as amicus curiae to express the value of the First Amendment to Black Americans. The current administration's attacks on diversity, equity, and inclusion caused a specific wave of backlash in the media space that caused the NNPA to lose nearly 80% of its advertising revenue.

Amicus Curiae **April D. Ryan** is an award-winning author and reporter, with nearly thirty years of experience as the nation's longest-serving Black, White House correspondent. Ms. Ryan is currently the White House correspondent for *The Contrarian*, a political analyst for Plaintiff MS NOW, and host of the podcast, *The Tea with April*. She has served on the board of the White House Correspondents Association—one of only four African Americans in the Association's more than 100-year history to do so—and is a member of the National Press Club and the Gridiron Club. During the first Trump Administration, she experienced significant hostility, including the revocation of her White House press credentials. Her voice is essential to understanding the gravity of the attacks against the Plaintiffs, but further to understanding the effect that the media ban has on her viewing audiences.

No party or party's counsel authored this brief in whole or in part or made a monetary contribution intended to fund its preparation or submission. No person other than *amici* made a monetary contribution to the preparation or submission of this brief. Both parties have consented to the timely filing of this brief.

SUMMARY OF ARGUMENT

The White House press corps plays a central role in our democracy, enabling all members of the public to understand the decisions that directly impact their lives. The Black press has been a steady voice, helping America keep its promises, particularly on issues concerning civil rights, Constitutional rights, and the actions of our government. President Trump's media ban violates the First Amendment and amounts to an all-out assault on the very principles, values and institutions that fortify an informed society. While there is a direct harm imposed on the networks targeted by the ban, the resulting impact on Black communities who rely upon free, and unfiltered access to the press extends far and wide. The viewership of the banned networks that have been singled out by President Trump are suffering significant harm because they are being stripped of access to news media sources that they trust. Indeed, statistics show that Black Americans trust Plaintiffs CNN, MS NOW, and Politico at higher rates than their White counterparts. By revoking, obstructing and continuing to limit Plaintiffs' access to, and direct coverage of, White House activity, President Trump's actions disproportionately harm Black Americans and other communities of color who are actively seeking access to information regarding White House statements, executive orders, policies, executive branch action and more. The ban also has a chilling effect on members of the Black press who rely, in part, on the White House press corps to fuel their reporting to the public. This ban cannot stand in a democracy that relies on the free flow of information from trusted sources. The denial of a preliminary injunction would have reverberating consequences for Black communities and communities of color whose civil and constitutional rights have been secured and reinforced through advocacy that is informed and shaped by media sources they value and trust.

I. THE BAN RUNS AFOUL OF THE FIRST AMENDMENT RIGHT TO RECEIVE INFORMATION AND HAS A STARK IMPACT ON BLACK VIEWERS OF NETWORK BROADCAST JOURNALISM.

The negative impact of the White House press ban on communities of color is undeniable. The ban reduces the range and variety of news sources available to Black communities that provide information about White House actions and other policy actions happening across the federal government. The ban is particularly consequential for Black audiences, for whom access to multiple news sources plays an important role in evaluating the credibility of the source of information. A 2023 Pew Research Center study found that 50% of Black adults consider whether a story is reported by multiple outlets extremely or very important in determining whether they trust a news story, while 46% of Black adults place similar importance on the specific news outlet publishing the story. *Black Representation in Newsrooms*, PEW RSCH. CTR. (Sep. 26, 2023), https://www.pewresearch.org/journalism/2023/09/26/black-representation-in-newsrooms. And without question, White House press access is important because it enables news organizations to obtain real-time information from the executive branch, question government officials, and provide their audiences with firsthand reporting about the activities of our federal government. The White House press corps has, and should always, play a role in holding power to account, in asking tough questions, and in considering the implications that executive action has on diverse communities.

Karine Jean-Pierre, who served as White House Press Secretary from 2022 to 2025, took seriously the White House's obligation to maintain an open, diverse and inclusive press corps and routinely solicited questions from a wide range of outlets. Jean-Pierre firmly believed, and continues to believe, that diversity makes the country stronger and that inclusion improves governance, especially when it comes to matters concerning the press.

President Trump's actions run contrary to well-settled First Amendment principles and Supreme Court jurisprudence. It is well-settled that the First Amendment not only protects freedom of speech and the press, U.S. CONST. amend. I, but it "*necessarily* protects the right to receive it." *Martin v. City of Struthers*, 319 U.S. 141, 143 (1943) (internal citation omitted) (emphasis added); *Stanley v. Georgia*, 394 U.S. 557, 564 (1969). As Justice Brennan explained in *Lamont v. Postmaster General*, "[t]he dissemination of ideas can accomplish nothing if otherwise willing addressees are not free to receive and consider them." *Lamont v. Postmaster Gen.*, 381 U.S. 301, 308 (1965) (Brennan, J., concurring). In the broadcast journalism context, the Court declared that "[i]t is the right of the viewers and listeners, not the right of the broadcasters, which is paramount," and that "[i]t is the right of the public to receive suitable access to social, political, esthetic, moral, and other ideas and experiences which is crucial [and] may not constitutionally be abridged." *Red Lion Broad. Co. v. FCC*, 395 U.S. 367, 390 (1969). Accordingly, the First Amendment "goes beyond protection of the press and the self-expression of individuals to prohibit government from limiting the stock of information from which members of the public may draw [upon]." *First Nat'l Bank of Bos. v. Bellotti*, 435 U.S. 765, 783 (1978). This inclusion is without exception—in other words, it applies to the Presidency of the United States, too.

The Supreme Court has explained that the right to receive information "is an inherent corollary of the rights of free speech and press that are explicitly guaranteed by the Constitution, in two senses." *Bd. of Educ., Island Trees Union Free Sch. Dist. No. 26 v. Pico*, 457 U.S. 853, 867 (1982). First, "the right to receive ideas follows ineluctably from the *sender's* First Amendment right to send [those]" ideas. *Id.*; *see also Martin*, 319 U.S. at 143 (1943) (recognizing that the freedoms of speech and press protect the right to receive literature as well as to distribute it). Second, and "[m]ore importantly, the right to receive ideas is a *necessary predicate* to the

recipient's meaningful exercise of his own rights of speech, press, and political freedom." *Pico*, 457 U.S. at 867 (first emphasis added). The Court grounds this second point in James Madison's warning that a popular government "without popular information, or the means of acquiring it, is but a Prologue to a Farce or a Tragedy," and that "a people who [serve to be their own] Governors, must arm themselves with the power which knowledge gives." *Id.* (quoting 9 Writings of James Madison 103 (G. Hunt ed., 1910)).

A. While Not Exclusive, CNN, MS NOW, and Politico are Among News Media Outlets that Many Black Americans Trust.

The right to receive information is strongest when the information concerns the government, because "a major purpose of [the First] Amendment [is] to protect the free discussion of governmental affairs." *Mills v. Alabama*, 384 U.S. 214, 218 (1966). The free press then has the incredible burden and blessing of being "one of the great interpreters between the government and the people," *Grosjean v. Am. Press Co.*, 297 U.S. 233, 250 (1936), that cannot and should not be constrained by government itself.

By excluding CNN, MS NOW, and Politico from the White House press corps, the President's media ban has disproportionate and harsher implications for Black audiences, who trust the very networks whose access has been revoked. A 2026 YouGov survey of 2,102 U.S. adults demonstrates that these outlets are used by and accessible to significant portions of Black audiences. YOUGOV SURVEY: TRUST IN MEDIA, YOUGOV, 21, https://ygo-assets-websites-editorial-emea.yougov.net/documents/Trust_in_Media_poll_results_TewWyVH.pdf. 45% of Black respondents reported using CNN as a regular news source, compared to 29% of respondents overall. *Id.* at 54. Among Black respondents, CNN was used more widely than Fox News, another cable network. *Id.* Additionally, 16% of Black respondents reported using MS NOW, compared with 10% overall, while 13% of Black respondents reported using Politico. *Id.* at 57, 81. These

surveys show that Black communities deem these networks to be trusted sources of information about federal governmental affairs. *Id.* at 54, 57, 81.

With respect to Black viewers between the ages of 25 and 54, CNN, was ranked as the #1 cable news network in March 2025 and in the first quarter of 2025. *CNN Ranks as Top 5 Most-Watched Network in All of Cable in March and* Q1, CNN (Apr. 1, 2025), https://cnnpressroom.blogs.cnn.com/2025/04/01/cnn-ranks-as-top-5-most-watched-network-in-all-of-cable-in-march-and-q1**.** Moreover, these higher viewership rates are not surprising given the relatively diverse slate of programming that these outlets provide. MS NOW, for example, has a lineup of Black anchors, analysts, and contributors such as: Plaintiff Akayla Gardner, who serves as the network's White House Correspondent; the Reverend Al Sharpton, a journalist and civil rights advocate who has hosted *Politics Nation* on the network for the past 15 years; Symone Sanders-Townsend and former Republican National Committee Chair Michael Steele who co-host *The Weeknight*; Jonathan Capehart and Eugene Davis who co-host *The Weekend*; Antonia Hylton who hosts *The Assignment with Antonia Hylton*; Charles Coleman, Jr. and Trymaine Lee who have co-hosted election-season specials like *Black Men in America: The Road to 2024*, among others. Other reporters of color, such as White House reporter Laura Barrón López who serves as a White House correspondent for MSNOW, help to ensure that there is full and rigorous reporting on White House actions.

CNN includes journalists such as Laura Coates, the network's Chief Legal Analyst, who hosts *Laura Coates Live* each weeknight with a sharp focus on White House and federal government affairs. Other CNN voices that Black viewers have come to trust include Abby Phillip, who served as the network's White House correspondent from 2017 to 2019, and currently host's *CNN NewsNight with Abby Phillip*, and Sara Sidner, current host of the morning edition of *CNN*

News Central. The network also features other commentators such as Republican strategist Shermichael Singleton. Anchors Victor Blackwell, Ben Hunte, Audie Cornish, Omar Jimenez, also offer coverage and perspective of national affairs, among others. These journalists bring a range of perspectives, varying approaches, and rigorous examinations to issues concerning the White House, helping to ensure viewers are fully informed and helping to garner trust from the public.

Interestingly, Newsmax and OAN are two outlets that were not included within the ban but are outlets upon which white Americans are more likely to rely. Amy Mitchell, *Large Majorities of Newsmax and OAN News Consumers Also Go to Fox News*, PEW RSCH. CTR. (Mar. 23, 2021), https://www.pewresearch.org/journalism/2021/03/23/large-majorities-of-newsmax-and-oan-news-consumers-also-go-to-fox-news/. Notably, 13% and 8% of White Americans said that they turned to Newsmax and OAN respectively for political news. *Id.* Compared to 5% and 4% of Hispanic Americans, and 2% and 1% of Black Americans, respectively, it is clear that Black and Hispanic Americans do not rely on Newsmax or OAN in the same quantity or degree as White Americans. *Id.*

Indeed, on any given day, the White House issues orders, makes statements, hosts meetings, invites visitors, and undertakes policy actions that implicate matters of great interest to communities of color. *See generally Trump Calls Somali Immigrants 'Garbage . . . They Contribute Nothing'*, CNN, at 03:08 (Dec. 3, 2025), https://www.youtube.com/watch?v=gzVVPrXSFAA (discussing President Trump's targeted immigration raids after saying "[Somalians] contribute nothing, I don't want them in our country to be honest with you . . . . We're going to keep going the wrong way, if we keep taking in garbage."); Exec. Order No. 14,253, 90 Fed. Reg. 14563 (Apr. 3, 2025) (directing federal agencies, national parks, and the Smithsonian Institution to remove narratives that focus on systemic racism,

equity-based topics, and policies the administration characterizes as "divisive, race-centered ideology"); *Trump 'in Crude Oval Office Outburst About Migrants'*, BBC (Jan. 12, 2018), https://www.bbc.com/news/world-us-canada-42656433 (discussing President Trump's comments during a meeting in the Oval Office where he referred to Haiti, El Salvador, and African countries as "shithole countries"). Moreover, there have been multiple executive orders signed in the White House that have a direct impact on the civil and constitutional rights of Black Americans.

The White House's arbitrary press ban removes trusted and widely used sources upon which Black audiences significantly rely, thus imposing a stark racial impact on these communities. Having these voices that viewers trust, without direct and immediate access to the events that transpire on the White House complex, suggests that Black audiences do not deserve the same level of access to information as other Americans. This simply is not true; the ban must be immediately enjoined by this court.

B. This Administration's Pattern of Imposing Media Bans Not Only Affects the Communities that these Reporters Reach but Impairs the Ability of Targeted Reporters to do Their Jobs Effectively.

The importance that Black audiences place on who delivers the news is further reflected in their views concerning Black journalists. About 68% of Black adults in 2023 considered it at least somewhat important that news concerning race and racial inequality come from Black journalists. *Black Americans' Experiences With News*, PEW RSCH. CTR. (Sep. 26, 2023), https://www.pewresearch.org/journalism/2023/09/26/black-americans-experiences-with-news/?ct=1790528884092. These findings demonstrate that some Black audiences value access to journalists who bring different perspectives to their reporting. The significance of that access can be seen in the role of journalists who serve as a direct connection between the executive branch and their core audiences.

The court should also consider the historical context of Defendants' actions. Indeed, this is not the first time that this administration has banned reporters or imposed restrictions on the press. This long pattern of unconstitutional conduct makes injunctive relief by the court all the more important. Longtime news reporter April Ryan has covered the White House since the Clinton Administration, first as the White House correspondent for American Urban Radio Networks ("AURN") from 1997 until 2020, later serving in the same role for *The Grio* and now *The Contrarian*. *April Ryan*, GEO. WASH. SCH. OF MEDIA & PUB. AFF., https://smpa.gwu.edu/april-ryan (last visited Sep. 27, 2026). She is the longest-serving Black White House Correspondent in the nation's history. AURN's programming reaches nearly 300 radio affiliates with a primarily Black audience. Ryan served as a direct connection between the executive branch and AURN's predominantly Black audience. Paul Farhi, *When Radio Reporter April Ryan Tangles With the White House, People Listen*, WASH. POST (Apr. 4, 2017), https://www.washingtonpost.com/lifestyle/style/when-radio-reporter-april-ryan-tangles-with-the-white-house-people-listen/2017/04/03/b2744ce8-18c0-11e7-9887-1a5314b56a08_story.html. In 2018, the Trump administration threatened to revoke Ryan's access to the White House. David Jackson, *Donald Trump Says He May Revoke Press Credentials for Other Reporters, Not Just CNN's Jim Acosta*, USA TODAY (Nov. 9, 2018), https://www.usatoday.com/story/news/politics/2018/11/09/donald-trump-threatens-other-reporters-white-house-press-passes/1942013002/. AURN responded by emphasizing that Ryan asked questions, "illuminating issues critical to our audience" and helped its audience "engage with and learn from" the presidency. April Ryan, *I'm a Black Woman. Trump Loves Insulting People Like Me.*, WASH. POST (Nov. 10, 2018),

https://www.washingtonpost.com/outlook/2018/11/10/im-black-woman-white-house-reporter-trump-loves-insulting-people-like-me/.

As a result of the direct attacks during the first term, Ms. Ryan and her family faced harassment from the public for her reporting.[1] While Ryan has been allowed to keep her press credentials under the current administration, she remains systematically excluded from the White House Press pool and has been denied access to the President. Ryan recently attended a press conference with Vice President Vance, where he ignored her questions and the questions of other Black journalists in the room, limiting their ability to ask questions, garner information and provide news to the public.

Attacks on Black journalists who cover the White House in a variety of settings, the exclusion of journalists of color, and the blatant disregard of Black reporter's questions have been evident throughout this administration. Restricting a single journalist's access to, or attacking reporters in a way intended to chill the nature of their reporting on, the White House can affect the relationship between a news organization and the public. Attacks on reporters such as Rachel Scott, Abby Philip, Yamiche Alcindor, Kristen Welker, and others provide additional context for understanding the impact of the president's most recent press ban. The attacks on these Black reporters aside, banning the very news outlets that Black communities rely on places this White House on a collision course with the First Amendment. The administration's actions stand to choke off the avenues through which Black communities receive direct information about the White House and the federal government broadly.

[1] Strangers would wait for Ryan outside of her home, the White House, and even public events she attended to confront her about her reporting on the White House. She has also dealt with bomb threats at her home which caused her to hire private bodyguards to ensure her protection from the variety of death threats she has received.

The stakes are especially high when considering the historic efforts made by the National Negro Publishers Association to advocate for Black reporters to have access to the White House credentials. Harry McAlpin, representing the *Atlanta Daily World*, was the first Black reporter to attend a press conference at the White House. Deborah Bailey, *A Pioneer in Journalism, Harry McAlpin Became the First Black White House Correspondent*, NAT'L NEWSPAPER PUBLISHERS ASS'N, https://nnpa.org/a-pioneer-in-journalism-harry-mcalpin-became-the-first-black-white-house-correspondent/ (last visited Sep. 28, 2026). McAlpin was granted credentials against a societal backdrop that was teeming with activity that necessitated Black reporters' access to the executive branch: A. Philip Randolph threatening a march on Washington to protest racial discrimination in the military during World War II; the formation of the Congress of Racial Equality (CORE) in 1942; and the NAACP's landmark victory in *Smith v. Allwright* at the U.S. Supreme Court which eliminated all-white primaries thus advancing voting rights for Black Americans. *The African American Odyssey: A Quest for Full Citizenship*, LIBR. OF CONG., https://www.loc.gov/exhibits/african-american-odyssey/depression-new-deal-and-world-war-ii.html (last visited Sep. 28, 2026); *Congress of Racial Equality (CORE)*, STANDFORD UNIV. MARTIN LUTHER KING, JR. RSCH. & EDUC. INST., https://kinginstitute.stanford.edu/congress-racial-equality-core; Derrick Johnson & Gary Bledsoe, *Honoring the 60th Anniversary of the Voting Rights Act*, NAACP (Aug. 6, 2025), https://naacp.org/articles/honoring-60th-anniversary-voting-rights-act. Among other things, these national events directly impacted Black Americans' lives and access to the White House press corps allowed for long-overdue focus on actions that the executive would take to address major areas of concerns for the Black community.

Despite this progress, Black reporters remained underrepresented and their access limited relative to their white counterparts, with only three Black reporters in the entire press corps in the

1950s. Lisa Goodnight, *'The Mother of a Movement': First Black Woman White House Correspondent is Finally Getting Recognition*, POYNTER (Nov. 21, 2018), https://www.poynter.org/reporting-editing/2018/the-mother-of-a-movement-first-black-woman-white-house-correspondent-is-finally-getting-recognition/. Alice Dunnigan later became the first Black woman to receive White House credentials and the first to travel with a United States President. *Alice Allison Dunnigan*, KY. WOMEN'S HIST. PROJECT, https://kywomenshistoryproject.com/alice-allison-dunnigan/ (last visited Sep. 28, 2026). Altogether, early Black journalists played a pivotal role in both relaying current events and shining light on the plight of Black people. And this history underscored by Amici urge relief that will prevent any further backsliding by this administration that puts in peril the hard-fought progress made to ensure access to the White House press corps.

C. Technology and Other Change has Fundamentally Altered the Way Americans Consume News Media.

The history of the Black press and the evolution of the media landscape further underscore why the Trump Administration's ban against the Plaintiffs' is so grievous. Over time, technological advances in media—the transition from print to televised news media—has entirely changed media consumption for Americans; a recent survey found that 63% of Americans prefer to watch or listen to the news than read it. Emily Tomasik & Christopher St. Aubin, *More Americans Prefer to Watch the News than Read or Listen to It*, PEW RSCH. CTR. (Nov. 20, 2025), https://www.pewresearch.org/short-reads/2025/11/20/more-americans-prefer-to-watch-the-news-than-read-or-listen-to-it/. Black Americans are more likely than other racial and ethnic groups in the United States to receive their news on television, with 38% of Black Americans identifying television as their top preference for receiving news. Michael Lipka, *8 Facts About Black Americans and the News*, PEW RSCH. CTR. (Feb. 13, 2024), https://www.pewresearch.org/short-

reads/2024/02/13/8-facts-about-black-americans-and-the-news/. Black viewers tend to seek out 24-hour cable news sources for updates on national government and politics, foreign or international issues, and social issues. Tomasik & St. Aubin, *supra*, 35.

After the Civil Rights movement, the circulation of the Black printed press began to decline as many Black people turned to television rather than newspapers. Eva Simpson, *Media: Faltering Printing Presses of Black America*, THE INDEP. (Aug. 24, 1998, 19:02 EDT), https://www.the-independent.com/arts-entertainment/media-faltering-printing-presses-of-black-america-1174018.html. Though they have historically had fewer financial resources than mainstream outlets, the transition of overall media consumption from print to television caused great strain on Black publications and made staying in circulation much harder. *Id.* at 1. Most print publications that could afford it, transitioned to digital or electronic platform; those that couldn't afford the switch either remain in print, consolidated resources with another publication, or died out entirely. *See* MIYA WILLIAMS FAYNE, THE BLACKISH PRESS: CONTENT, OWNERSHIP, AND AUDIENCE OF DIGITAL BLACK NEWS OUTLETS 13, 18 (2026) (discussing the financial limitations in Black print press operations that limit the ability of some operations to invest in technologies and the success some publications have had entering into the digital space); *see also What History Teaches Us: How Newspapers Have Evolved to Meet Market Demands*, UNIV. OF N.C. CTR. FOR INNOVATION AND SUSTAINABILITY IN LOC. MEDIA, https://www.cislm.org/what-history-teaches-us-how-newspapers-have-evolved-to-meet-market-demands/ (last visited Sep. 28, 2026) (discussing newspaper publications that went out of business because of technology and publications that merged because of financial pressures).

While technology has changed the Black media industry, President Trump's unlawful press ban has further weakened the Black press at an alarming rate over the last year and a half. Some

reports indicate, and *amici* National Association for Black Journalists report, that the Black press has lost 80% of its revenue, in part, because of the administration's attacks on diversity, equity and inclusion. This loss of revenue has created financial constraints that have limited the ability of some local Black journalists to cover the White House. *See generally* Richard Prince, *In Anti-DEI Era, Black Press Loses 80% of Revenue*, JOURNAL-ISMS (January 26, 2026), https://www.journal-isms.com/in-anti-dei-era-black-press-loses-80-of-revenue/ (noting that the Black press has lost 80% of revenue because of the Administration's "Anti-DEI" agenda, which has created financial constraints that have limited Black journalists' ability to cover the White House). Given this reality, it is all the more important that Defendants not be permitted to move forward with a ban that would further restrict Black communities' access to information regarding White House and executive branch activity. While the Trump Administration's ban itself is patently unconstitutional, the scope of the ban has a particularly stark impact on Black communities across the country.

CONCLUSION

The Executive's exclusion of reporters demonstrates that access to the White House press corps is not merely an institutional benefit for individual news organizations. It is part of the mechanism by which the public receives firsthand information about the actions of its government. If allowed to stand, the revocation of Plaintiffs' White House press corps access, not only impairs the ability of CNN, MS NOW, and Politico to provide their audiences with firsthand reporting from the seat of executive power, but fundamentally denies all Americans and Black communities, in particular, the right to be fully informed about our government at a time of war, in the middle of an election season, and at a time when Black Americans are experiencing dramatic change on a range of issues implicating their civil and Constitutional rights.

For the foregoing reasons, amici respectfully request that the court grant Plaintiffs' motion for a preliminary injunction.

Dated: October 1, 2026

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

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I hereby certify that on October 1, 2026, I electronically filed the foregoing with the Clerk of the Court for the United States District Court of the District of Columbia by using the appellate CM/ECF system.

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